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February 26, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Xclutel Communications, LLC
EB Docket No. 06-36; CPNI Certification for CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Xclutel Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwrightman@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: FCx1901

Enclosures
CW/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification	Covering calendar year 2018
Name of company(s) covered by this certification:	Xclutel Communications, LLC
Form 499 Filer ID:	828021
Name of signatory:	Scott Sinclair
Title of signatory:	Chief Executive Officer

1. I, Scott Sinclair, certify that I am an officer of the Company named above, and acting as an agent of the company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Scott Sinclair, Chief Executive Officer

2/25/19

Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance Xclutel Communications, LLC

Use of CPNI

Xclutel Communications, LLC ("Xclutel") does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Xclutel elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

PROTECTION OF CPNI

Xclutel has put into place processes to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. These processes include identification of CPNI retained by the company, where it resides and who has access to it.

Xclutel ensures that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements. Xclutel has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Training includes providing employees with a copy of the FCC's rules regarding CPNI, description and examples of CPNI and pretexting, written policies and procedures for handling CPNI inquiries. All personnel and vendors with access to CPNI are required to sign a confidentiality agreement and acceptable use policy statement. Xclutel provides access to CPNI policies on its intranet so that all employees have access to the proper methods of maintaining CPNI confidentiality.

Xclutel maintains a record of all sales and marketing campaigns that use CPNI.

Xclutel maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

DISCLOSURE OF CALL DETAIL OVER PHONE

Xclutel has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Xclutel's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Xclutel authenticates customers by requiring the customer to establish a password for this purpose. All customers are required to establish a password without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, Xclutel does not disclose call detail over the telephone.

Xclutel does not offer a back-up authentication method, but does allow a customer to reset a lost password. Instructions for resetting the password are provided via mail or email to the address established by the customer of record.

The Company has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. The Customer of Record is notified by email that the account information has been updated or changed and is given instructions to notify the company's customer service number if the customer believes the account may have been updated or changed in error.

DISCLOSURE OF CPNI ONLINE

Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

DISCLOSURE OF CPNI AT RETAIL LOCATIONS

Xclutel does not have any retail locations and therefore does not disclose CPNI in-store.

NOTIFICATION TO LAW ENFORCEMENT

Xclutel has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Xclutel's policy is to notify law enforcement as soon as practicable, but in no event later than seven (7) business days, after a reasonable determination has been made that a breach of its customer's CPNI has occurred. Similarly, Xclutel's policy is to notify customers of the breach no sooner than the eighth business day following completion of the notice to law enforcement unless directed by the U.S. Secret Service or the FBI not to so disclose or notify customers. Xclutel may extend the period for customer notification pursuant to a written request of a relevant law enforcement agency. Xclutel will maintain electronic records of all breaches discovered and notifications made to the USSS and the FBI, and to affected customers.

ACTIONS AGAINST DATA BROKERS

Xclutel has not taken any actions against data brokers in the last year.

CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Xclutel did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2018.

INFORMATION ABOUT PRETEXTERS

Xclutel has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by password protecting all CPNI and verification of law enforcement inquiries. When fielding a request from a privileged caller (an attorney, law enforcement, etc.), all such requests are immediately sent to Xclutel Compliance Department personnel. Compliance personnel will review each such request and requires proper documentation before detailed information is released.